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OFFICE OF THE SECRETARY
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IN REPLY REFER TO:

92-237

Mr. George H. Heilmeier
President and Chief Executive Officer
Bell Communications Research
290 West Mt. Pleasant Avenue
Livingston, New Jersey 07039-2798

Dear Mr. Heilmeier:

Chairman Quello asked me to respond to your letter of August 16, 1993, in which you announced that Bellcore would like to relinquish its role as Administrator of the North American Numbering Plan (NANP).

As you know, the Federal Communications Commission has already initiated an inquiry into the future administration of the NANP. I believe that the many constructive comments received in this proceeding, along with your assistance and the cooperation of our fellow regulators in other World Zone 1 countries, will enable us to achieve a smooth transfer of the NANP administration. Indeed, I was pleased to receive word from my Canadian counterpart, Mr. Michael Binder, the Assistant Deputy Minister for Spectrum, Information Technologies and Telecommunications, that they intend to participate in this process.

While many of the commenters in our inquiry argue that the administration of the NANP should be moved elsewhere, none dispute the fact that the seamless numbering network for World Zone 1 is without duplication anywhere else in the world. Indeed, the European community is now seeking to achieve the same efficiencies we already experience here.

As we prepare to address future NANP administration, we will require your assistance during a transition period. While we will strive to respond to your request within a reasonable time, we unfortunately do not yet know how long that process might take. In some respects, a transition may require us to ask more of Bellcore than you have previously contributed.

It is especially important that the implementation of interchangeable area codes and the expansion of Feature Group D carrier identification codes be accomplished as smoothly as possible. Both of these activities are scheduled for early 1995. Although major users and communications firms seem well

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prepared for these changes, any change in numbering inherently causes some dislocations. I would therefore like to ask Bellcore to take the lead in establishing a consumer education program so that the burdens associated with these changes will be minimized. Additional effort on monitoring, conservation, and reclamation may also be required to ensure that the supply of Feature Group D codes is sufficient to last until additional codes become available in 1995.

We appreciate your letter and offer of assistance during the transition.

Sincerely,

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Kathleen B. Levitz
Acting Chief
Common Carrier Bureau

Belcore

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FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

George H. Hellmeyer
President and Chief Executive Officer

290 West Mt. Pleasant Avenue
Livingston, New Jersey 07039-2798
201-740-3131

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August 16, 1993

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92-237

James H. Quello, Chairman
Federal Communications Commission
Room 802
Stop Code 0106
1919 M Street
Washington, DC 20054

Dear Chairman Quello:

As a result of the many changes in the telecommunications environment that have resulted in increased controversy regarding numbering, Bellcore and its owners believe that it is time to relinquish Bellcore's voluntary administration of the North American Numbering Plan (NANP), and to establish a plan for transferring this activity elsewhere.

As the Commission knows, Bellcore has been the North American Numbering Plan Administrator (NANPA) on behalf of the entire industry in World Zone 1 since divestiture, when that function was transferred to Bellcore from AT&T with the approval of the MFJ Court. Bellcore has administered NANP-wide numbering resources such as Numbering Plan Area (NPA) codes, Service Access Codes (SACs), Carrier Identification Codes (CICs), and administration of the 809 NPA code. Bellcore, as NANPA, has been a responsible and impartial caretaker of the numbering resources it has administered, and has promoted the public interest by seeking to maximize efficiency and minimize costs sustained by all, users and service providers alike.

Nevertheless, some have claimed -- without basis -- that Bellcore might discriminate in favor of its owners or the exchange carrier segment of the industry. While the record is clear that Bellcore has not done so, the combination of changes in the industry environment and increases in the intensity and number of these attacks has convinced Bellcore and its owners that it would be wise to establish a plan for transferring the NANPA function. We emphasize and know that you agree that numbering decisions are important to this industry and to the public: that they affect service providers and the end users in the United States, in 17 other World Zone 1 nations and internationally; and that they must continue to be made in a fair, impartial, timely and competent fashion. We think it is essential that Bellcore's successor as NANPA must continue to serve these objectives. We believe that this should continue to be done subject to government oversight, but in a manner that does not become bogged down in unnecessarily time-consuming processes.

Therefore, Bellcore hereby advises the FCC (and other appropriate bodies in World Zone 1 by copy of this letter) that an industry process should immediately be initiated to transfer the NANPA function from Bellcore to one or more alternative entities. A transition will be needed, and it must be orderly, satisfy the needs of the industry, be handled in a

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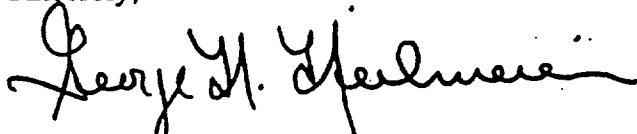
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responsible and competent manner, and be accomplished in a reasonable time period. We believe that this transition can be completed within a 12 to 18 month time frame, and intend to work toward that result.

Furthermore, the industry should have the opportunity informally to address what entity(ies) should perform the NANPA function, with what funding, and under what procedures and oversight. We ask that the Commission encourage this industry process to commence promptly, and for its staff to participate actively. We similarly encourage the informal participation of parties from other World Zone 1 nations in public forums.

After this industry action, there will be time for the Commission to initiate and conduct whatever formal proceedings it deems appropriate to accomplish the transfer. In the event that the industry is not able to reach consensus on administration and procedures, as well as organization and operation of an oversight body within the period mentioned above, Belcore would be willing, at the direction of the Commission, to continue to provide the administration function beyond the contemplated transition period.

Sincerely,



George H. Heilmeyer
President and CEO

Copy to:

Other World Zone 1 Entities

Anguilla
Commonwealth of the Bahamas
Bermuda
Cayman Islands
Dominican Republic
Jamaica
Saint Kitts and Nevis
Saint Vincent and the Grenadines
Trinidad and Tobago

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NANPA Distribution List